Supertubuly Division gover

January 23, 1969

Re: Letter of 1/20/69

Mr. G. W. Dutcher Director of Public Works New Castle County New Castle County Engineering Bldg. Kirkwood Highway, P. O. Rox 165 Wilmington, Delaware 19899

Dear Mr. Dutcher:

With respect to item 10, page 11, of the State Solid Waste Disposal Code, the prime concern of the State Board of Health is to ensure that hazardous solid wastes are recognized by the operating authority and that suitable means for their disposal are developed and utilized. Industrial solid wastes may be of many kinds, some of which are hazardous (such as containers in which arsenic has been stored). For the most part, industrial solid wastes are an unknown quantity at the present time. This is why the Solid Waste Disposal Code, item 10, page 11, exists - to make the operational authority responsible for identification of the industrial solid wastes coming into a landfill and to establish a "review" of these wastes for potential hazards (see definition of hazardous solid wastes - 38.108). The staff of the Board of Health must "review" these wastes for potential hazards, also. This is why a plan must be submitted to the Board of Health.

The list of industrial solid wastes which you have identified as being accepted at the new county landfill does not include any readily identifiable hazardous solid wastes. I suggest, however, that an effort be made to identify all industrial solid wastes accepted - to the greatest extent possible. For example, the empty steel and cardboard drums may have contained hazardous substances. Also, "light manufacturing of various materials" is not very definitive.

For the present time, the equipment operators and refuse supervisor may offer a means of detection of hazardous solid wastes. They should keep their eyes open and be inquisitive. When solid wastes accepted are obviously non-hazardous, they may be routinely accepted at the land-fill. The industrial solid wastes listed in your latter may be regarded as non-hazardous and accepted at the fill. Constant vigilance will be necessary, however.

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There appears to have been no problem with your handling of bulky solid wastes at the new landfill and so your methods of handling of such items are approved by us.

One further item, the blowing paper on the fill should be controlled and cleaned up at regular intervals when necessary. The small amount of effort and dollars necessary to do this will reap much benefit in public relations in addition to being required by the Solid Waste Disposal Code.

Your cooperation in these matters is appraciated.

Very truly yours,

Robert Westerman, Sanitary Engineer Director, Div. of Solid Wastes Bureau of Environmental Health

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